IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS.

2005 APR -4 AM 10: 03

CLERK, U.S. DISTRICT COURT VESTERN DISTRICT OF TEXAS

Civil Action No. SA-05-CA-0245-FB

LAUREN BROWNING, Plaintiff,

v.

SOUTHWEST RESEARCH INSTITUTE,

Defendant.

## **DEFENDANT'S DESIGNATION OF POTENTIAL WITNESSES**

8888888

TO THE HONORABLE JUDGE OF SAID COURT:

Pursuant to the Court's Scheduling Order of November 18, 2005, Defendant Southwest Research Institute submits Defendant's Designation of Potential Witnesses. Defendant reserves the right to amend and/or supplement this list pursuant to Fed. R. Civ. P. 26(a)(3)(c) after discovery in this matter has been completed.

William Beckham **SwRI** c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210) 224-5575

John Bradbury U.S. Nuclear Regulatory Commission One White Flint North 11555 Rockville Pike Mail Stop: 7727 Rockville, Maryland 20852 (301) 415-6597



David Brooks
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Mail Stop: 7727
Rockville, Maryland 20852
(301) 415-7284

Lauren Browning, Ph.D. c/o Hal Gillespie 3402 Oak Grove Ave., Suite 200 Dallas, TX 75204 (214) 720-2009

Bill Bourcier Lawrence Livermore National Laboratory 7000 East Avenue Mail Stop: L-221 Livermore, CA 94550 (925) 423-3745

Peter Bryant Plaintiffs Husband 9014 Saddle Trail San Antonio, TX 78255 (210) 698-0524

Shannon Casey Sandia National Laboratories 4100 National Parks Highway Carlsbad, New Mexico 88220

Rui Chen P.O. Box 792 Chico, CA 95927

31089035 2 - 2 -

Gustavo Cragnolino SwRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210) 224-5575

Bill Crumlett SWRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210) 224-5575

William Dam
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Mail Stop: 7727
Rockville, Maryland 20852

Cynthia Dinwiddie SwRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210) 224-5575

Walt Downing SwRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210) 224-5575 David Esh
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Mail Stop: 7J8
Rockville, Maryland 20852
(301) 415-6705

Randall Fedors SwRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210) 224-5575

David W. Griffin, Ph.D., Director LECG 1608 Walnut Street, Suite 1200 Philadelphia, PA 19103 (215) 546-4950

Gregory Hatchett
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Mail Stop: 16C1
Rockville, Maryland 20852
(301) 415-1827

Joan G. Haworth, Ph.D. ERS Group 4901 Tower Court Tallahassee, FL 32303 (850) 562-1211

Rolland Hellmann Geochemical Transactions Associate Editor Laboratoire de Geophysique Interne et Tectonophysique Suite 1N01,2 Huntington Quadrangle Melville, NY 11747-4502 (516) 576-2403 Melissa Hill University of South Florida Karst Research Group 4202 E. Fowler Ave., SCA 528 Tampa, Florida 33620 (813) 974-8751

Debra Hughson National Parks Service Mohave Desert National Preserve

Dr. John R. Huriega, DDS 8235 Fredericksburg Rd. San Antonio, TX 78229 (210) 616-0858

Walter Illman SwRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210) 224-5575

Barbara James SwRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210) 224-5575

Miriam Juckett SwRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210) 224-5575

Sharon Kelly, Ph.D. ERS Group 4901 Tower Court Tallahassee, FL 32303 (850) 562-1211 Custodian of Records for Keramont Corporation 4231 South Freemont Ave. Tucson, Arizona 85714

Bret Leslie
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Mail Stop: 7727
Rockville, Maryland 20852
(301) 415-6652

Custodian of Records for Lunar and Planetary Institute 3600 Bay Area Blvd. Houston, Texas 77058 (281) 486-2180

Bruce Mabrito SwRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 9210) 224-5575

Patrick Mackin SwRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210) 224-5575

Tony Magaro SwRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210) 224-5575 Chandrika Manepally SwRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210) 224-5575

Jude McMurry SwRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210) 224-5575

William M. Murphy P.O. Box 792 Chico, CA 95927

Custodian of Records for National Aeronautics & Space Administration (NASA) Electron Beam Laboratory 2101 NASA Parkway, Mail Code AL, Legal Dept. Houston, Texas 77058 (281) 483-3021

Marius Necsoiu SwRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210) 224-5575 Dr. Roberto Pabalan SwRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210) 224-5575

Scott Painter SwRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210) 224-5575

Dr. Wesley Patrick SwRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210) 224-5575

Dr. English C. Pearcy SwRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210) 224-5575

Custodian of Records Kay Pennington Therapist

Dr. David Pickett SwRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210) 224-5575 Dr. Jeffrey Pickens, MD Leon Springs Family Practice 24165 W IH 10, #118 San Antonio, TX 78257-1160 (210) 698-7777

Roe Porche SwRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210) 224-5575

James Prikryl SwRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210)224-5575

Art Ramos SwRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210) 224-5575

Dr. Budhi Sagar SwRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210) 224-5575

Custodian of Records for Sandia National Laboratories P.O. Box 5800 MS-0141, Legal Department Albuquerque, New Mexico 87185-0141 (505) 234-0026 Custodian of Records for Service Employee's International Union 1405 N. Main, Ste. 200 San Antonio, Texas 78212 (210) 225-1967

Michael Smith Pacific Northwest National Laboratory P.O. Box 999 Richland, WA 99352 (888) 375-7665

Dr. Narasi Sridhar SwRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210) 224-5575

Simcha Stroes-Gascoynes Plaintiff will supplement

Dr. Jeffrey Taylor University of Hawaii 2525 Correa Rd. Honolulu, Hawaii 96822 (808) 956-3899

Custodian of Records for Texas Industrial Areas Foundation 1106 Clayton, Ste. 120-W Austin, Texas 78723 (512) 459-6551

Custodian of Records for TEXPIRG (Texas Public Interest Research Group) 700 West Avenue, #100 Austin, Texas 78701-2727 (512) 479-7287

"Potential Employer"
TexPIRG
1604 ½ San Antonio Street
Austin, Texas 78701

31089035.2

Stephanie Thomas, Ph.D., Managing Director LECG 1608 Walnut Street, Suite 1200 Philadelphia, PA 19103 (215) 546-4950

Rick Trilsch U.S. PIRG Administrative Director 218 D Street, SE Washington, D.C. 20003-1900

David Turner SwRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210) 224-5575

Custodian of Records for University of Hawaii at Manoa School of Ocean, Earth Science and Technology 2525 Correa Road Honolulu, Hawaii 96822 (808) 956-5066

Custodian of Records for University of Texas at Austin – GEO 1 Science Department P.O. Box 8179 Austin, Texas 78713-8179 (512) 471-1534

James Winterle SwRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210) 224-5575 Danielle Wyrick SwRI c/o counsel, Cynthia M. Benedict Fulbright & Jaworski L.L.P. 300 Convent Street, Suite 2200 San Antonio, TX 78205 (210) 224-5575

Norm Yen Service Employee's International Union Houston, Texas and/or 123 S. Flores San Antonio, Texas 78204

Dr. Michael Zolensky NASA Johnson Space Center Mail Code KT Houston, Texas 77058 (281) 483-5128

Dated: April 4, 2006

OF COUNSEL:

FULBRIGHT & JAWORSKI L.L.P.

Respectfully submitted,

Cyndi M. Benedict

State Bar No. 03322000

Stephen J. Romero

State Bar No. 24046756

300 Convent Street, Suite 2200

San Antonio, Texas 78205-3792

Telephone: (210) 224-5575

Facsimile: (210) 270-7205

Counsel for Defendant

SOUTHWEST RESEARCH INSTITUTE

## **CERTIFICATE OF SERVICE**

This pleading, Defendant's Designation of Potential Witnesses, was served in compliance with Rule 5 of the Federal Rules of Civil Procedure by Certified Mail, Return Receipt Requested on Monday, April 3, 2006.

Hal K. Gillespie, Esq. M. Jeanette Fedele Gillespie, Rozen, Watsky, Motley & Jones, P.C. 3402 Oak Grove Ave., Suite 200 Dallas, TX 75204 Ms. Malinda Gaul Gaul and Dumont 111 Soledad, Suite 725 San Antonio, TX 78205

Cyndi M. Benedict